

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

R.M.S. TITANIC, INC.,  
successor-in-interest to  
Titanic Ventures, limited partnership,  
Plaintiff,

v.

Civil Action No. 2:93cv902

THE WRECKED AND ABANDONED VESSEL,  
ITS ENGINES, TACKLE, APPAREL,  
APPURTENANCES, CARGO, ETC., LOCATED  
WITHIN ONE (1) NAUTICAL MILE OF A POINT  
LOCATED AT 41 43/ 32' NORTH LATITUDE  
AND 49 56' 49" WEST LONGITUDE,  
BELIEVED TO BE THE R.M.S. TITANIC  
in rem,

Defendant.

**PERIODIC REPORT**

NOW COMES Plaintiff, R.M.S. Titanic, Inc. ("RMST" or the "Company"), by counsel, and files this Periodic Report of R.M.S. Titanic, Inc. on the Progress of Research and Recovery Operations ("Periodic Report").

**I. Protection and Monitoring of the Wreck Site and Collection.**

On June 7, 2022, the Court sent the Company a letter directing it to file a report and update on the upcoming auction of four (4) artifacts recovered from the *R.M.S. Titanic* wreck site by Guernsey's Auction House (the "Artifacts" and "Guernsey's" respectively). Specifically, the Court directed the Company to file a report on the Auction, RMST's legal interest in the Artifacts, and any legal proceedings related to its claim. As reported to the Court in its June 13, 2022 Periodic Report, Guernsey's has suspended its efforts to sell the artifacts at auction.

On July 3, 2022, the Company filed a two count Complaint against Mobile Grocers of America, LLC, Strongbow Holdings, LLC and Maureen Daly, *et al.*, Case No. 1:22-cv-05685 in

the Supreme Court of the State of New York, County of New York (the “RMST Litigation”). In the first count, the Company seeks a judicial declaration that RMST is the lawful owner of the Artifacts, that the defendants have no legal rights or interests therein, and directing the defendants to return the Artifacts to RMST as lawful owner. In the second count, the Company seeks the issuance of an injunction prohibiting the defendants from selling, transferring or otherwise disposing of the Artifacts, or otherwise taking any action in contravention of the Company’s right and interests in the Artifacts. A copy of the Complaint in the RMST Litigation is attached hereto as Exhibit 1.

On July 5, 2022, Strongbow Holdings, LLC file a Notice of Removal removing the RMST Litigation to the United States District Court for the Southern District of New York. A copy of the Notice of Removal is attached hereto as Exhibit 2. Also on July 5, 2022, Strongbow Holdings, LLC filed a three count Complaint against RMS Titanic, Inc. in the United States District Court for the Southern District of New York, Case No. 22 Civ. 5680 (“Strongbow” and the “Strongbow Litigation” respectively). In the first count of the Strongbow Litigation, Strongbow seeks a judicial declaration that RMST has no legal claim to the Artifacts and that Strongbow holds good title to them. In the second and third counts, Strongbow alleges slander of title and tortious interference which actions it alleges derailed the auction and damaged Strongbow. A copy of the Complaint in the Strongbow Litigation is attached hereto as Exhibit 3.

RMST will keep the court updated in future developments in the RMST Litigation and the Strongbow Litigation.

Respectfully submitted,

**RMS TITANIC, INC.**

By Counsel:

/s/ Brian A. Wainger

Brian A. Wainger, VSB #38476

*Attorney for Plaintiff RMS Titanic, Inc.*

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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2022, a copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Brian A. Wainger  
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